

RECEIVED
FEDERAL ELECTION
COMMISSION

2014 MAY 21 PM 2:30

OFFICE OF GENERAL
COUNSEL

Trackside

John D'Aloia, Jr.

St. Marys, KS 66536

May 16, 2014

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

MUR # 6827

To Whom It May Concern:

I wish to file a complaint against Kent Roth for Kansas (C00554824) for violating Federal Election Campaign Laws. Specifically, Kent Roth for Kansas violated The Federal Election Campaign Act (FECA) of 1971, Title 2, Section 438(a)(4) which states: *within 48 hours after the time of the receipt by the Commission of reports and statements filed with it, make them available for public inspection, and copying, at the expense of the person requesting such copying, except that any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.*

Kent Roth for Kansas sent me a solicitation letter dated February 28, 2014 (enclosed). I have never been in contact with Kent Roth and did not know of him until he sent me this letter. The letter was addressed in an odd fashion, listing me as 'Captain John D'Aloia, Jr.' with the salutation of 'Captain John.'

I am a friend and supporter of Congressman Tim Huelskamp (KS-1). I most recently contributed \$500 to his campaign on December 13, 2013. I brought Roth's letter to Congressman Huelskamp's attention and asked if he knew Roth. After sending Congressman Huelskamp a copy of the letter, he informed me that my last contribution was reported to the Federal Election Commission identically to the manner in which Kent Roth for Kansas addressed the February 28, 2014 letter to me: Captain John D'Aloia, Jr.

The only plausible explanation is that Kent Roth for Kansas violated Federal Election Campaign Law by copying information from the Kansans for Huelskamp FEC Reports and used that information for the purpose of soliciting contributions or for commercial purposes.

I am a retired Navy captain. I do not use the title in my community and political activities; neither my letterhead (above) nor the imprint on my checks contain the rank/service identification. Congressman Huelskamp does know of my Navy service as a result of our contacts over the years.

The salutation "Captain John" is extremely informal, presumptive, and offensive coming from a complete stranger. Some people do call me Captain John, but they are close friends and shipmates. That Roth's letter carried the salutation it did indicates to me that it was blindly generated using a source that so identified me.

I was informed that at least four other donors to Kansans for Huelskamp had reported receiving an identical letter from Kent Roth for Kansas. (enclosed) The aforementioned donors all made contributions to Kansans for Huelskamp which were itemized and disclosed on subsequent FEC Reports. In addition, I was told that each of the four additional solicitation letters is addressed exactly in the manner the contributor is listed by Kansans for Huelskamp in their FEC Reports.

The Kansans for Huelskamp donors who received the solicitation from Kent Roth for Kansas are listed below:

- Matthew Hickam – September 4, 2013, contributed to Kansans for Huelskamp
- Dennis Potter – June 29, 2013, contributed to Kansans for Huelskamp
- Alice Steward – December 29, 2013, contributed to Kansans for Huelskamp
- Federal Home Loan Bank of Topeka Pac (Pac is identical and lowercase in the Huelskamp filing and Roth letter) – August 12, 2013, contributed to Kansans for Huelskamp

I am surprised that a candidate for Congress would ignore the FECA, apparently using information copied from Kansans for Huelskamp's FEC reports for the purposes of soliciting campaign donations. Please accept my complaint against Kent Roth for Kansas and I urge the FEC to investigate this possible violation of Federal Election Campaign Laws, and prosecute as appropriate based on findings of fact.

Sincerely,

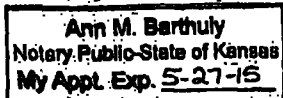


Enclosures:

- (1) Captain John D'Aloia letter from Kent Roth for Kansas dated February 28, 2014
- (2) Matthew Hickam letter from Kent Roth for Kansas dated February 28, 2014
- (3) Dennis Potter letter from Kent Roth for Kansas dated February 28, 2014
- (4) Alice Steward letter from Kent Roth for Kansas dated February 28, 2014
- (5) Federal Home Loan Bank of Topeka Pac letter from Kent Roth for Kansas dated February 28, 2014

State of Kansas

County of Pottawatomie



Subscribed and sworn to (affirmed) before me on this:

16th day of May, 2014 by John D'Aloia Jr.
(day) (month)

Proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature Ann M Barthuly
Signature of Notary Public

Kent Roth for Kansas
1st District, Congress
Don Peter, C.P.A.
Treasurer: (913) 486-3237
dpeter.cpa@gmail.com

10 North Main Street
Suite B
Ellinwood, KS 67526
[Facebook.com/kentrothescquire](https://facebook.com/kentrothescquire)
Domain: kentroth.com

Phone: (620) 564-2090
Fax: (620) 564-2098
Mobile: (620) 282-4054
kentroth@kentroth.com



Kent Roth, 1st District

February 28, 2014

Captain John D'Aloia, Jr.

Saint Marys, Kansas 66536-1517

Re: Kent Roth for Kansas

Dear Captain John:

Thank you for the opportunity to invite you to visit Kent Roth Congressional Campaign which is my facebook page in connection with the above campaign for Congress in the First District of Kansas.

I mailed my papers to the Federal Election Commission which makes me a Candidate in a race to defeat Tim Huelskamp in the 2014 Republican Primary Election. The maximum any one person may give per election is two thousand six hundred (\$2,600) dollars. Federal law prohibits corporate, national bank, union, government contractor or foreign national to contribute. However, I am not asking you to make a contribution at this time, but rather take the time to get to know me.

Please visit my facebook page or web site: kentroth.com making any comments or posts you desire. You are assured of my prompt reply to any questions you may wish to direct to me and both you and the public will have the opportunity to review my reply and be fully informed on the issues. Should you prefer to send questions in writing, please find enclosed a self addressed envelope for your inquiry.

Very truly yours,

Kent A. Roth

Kent Roth for Kansas
1st District, Congress
Don Peter, C.P.A.
Treasurer: (913) 486-3237
donpeter@kentroth.com

10 North Main Street
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Fax: (620) 564-2098
Mobile: (620) 282-4054
kentroth.com/kentroth.com



Kent Roth, 1st District

February 28, 2014

Mr. Matthew Hickam

[Redacted Address]
Topeka, Kansas 66615-1493

Re: Kent Roth for Kansas

Dear Matthew:

Thank you for the opportunity to invite you to visit Kent Roth Congressional Campaign which is my facebook page in connection with the above campaign for Congress in the First District of Kansas.

I mailed my papers to the Federal Election Commission which makes me a Candidate in a race to defeat Tim Huelskamp in the 2014 Republican Primary Election. The maximum any one person may give per election is two thousand six hundred (\$2,600) dollars. Federal law prohibits corporate, national bank, union, government contractor or foreign national to contribute. However, I am not asking you to make a contribution at this time, but rather take the time to get to know me.

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Kent A. Roth

14047470008

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Mobile: (620) 282-4054
kentroth@kentroth.com



Kent Roth, 1st District

February 28, 2014

Dennis Potter

Alexandria, Virginia 22304-5607

Re: Kent Roth for Kansas

Dear Dennis:

Thank you for the opportunity to invite you to visit Kent Roth Congressional Campaign which is my facebook page in connection with the above campaign for Congress in the First District of Kansas.

I mailed my papers to the Federal Election Commission which makes me a Candidate in a race to defeat Tim Huelskamp in the 2014 Republican Primary Election. The maximum any one person may give per election is two thousand six hundred (\$2,600) dollars. Federal law prohibits corporate, national bank, union, government contractor or foreign national to contribute. However, I am not asking you to make a contribution at this time, but rather take the time to get to know me.

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kentroth@kentroth.com



Kent Roth, 1st District

February 28, 2014

Alice Steward

Prairie Village, Kansas 66208-2014

Re: **Kent Roth for Kansas**

Dear Alice:

Thank you for the opportunity to invite you to visit Kent Roth Congressional Campaign which is my facebook page in connection with the above campaign for Congress in the First District of Kansas.

I mailed my papers to the Federal Election Commission which makes me a Candidate in a race to defeat Tim Huelskamp in the 2014 Republican Primary Election. The maximum any one person may give per election is two thousand six hundred (\$2,600) dollars. Federal law prohibits corporate, national bank, union, government contractor or foreign national to contribute. However, I am not asking you to make a contribution at this time, but rather take the time to get to know me.

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Very truly yours,

Kent A. Roth

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Kent Roth, 1st District

February 28, 2014

Federal Home Loan Bank Of Topeka Pac
PO Box 176
Topeka, Kansas 66601-0176

Re: **Kent Roth for Kansas**

Dear Sir:

Thank you for the opportunity to invite you to visit Kent Roth Congressional Campaign which is my facebook page in connection with the above campaign for Congress in the First District of Kansas.

I mailed my papers to the Federal Election Commission which makes me a Candidate in a race to defeat Tim Huelskamp in the 2014 Republican Primary Election. The maximum any one person may give per election is two thousand six hundred (\$2,600) dollars. Federal law prohibits corporate, national bank, union, government contractor or foreign national to contribute. However, I am not asking you to make a contribution at this time, but rather take the time to get to know me.

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